

1 JOHN L. BURRIS, Esq./ State Bar #69888
 2 BENJAMIN NISENBAUM, Esq./ State Bar #222173
 3 LAW OFFICES OF JOHN L. BURRIS
 4 7677 Oakport Street, Suite 1120
 5 Oakland, California 94621
 6 Telephone: (510) 839-5200
 7 Facsimile: (510) 839-3882

8
 9 Attorneys for Plaintiff M.H., a minor through his
 10 Guardian Ad Litem, Michelle Henshaw

11 MICHAEL J. HADDAD, Esq./ State Bar #189114
 12 JULIA SHERWIN, Esq./State Bar #189268
 13 GENEVIEVE K. GUERTIN, Esq./State Bar #262479
 14 HADDAD & SHERWIN
 15 505 Seventeenth Street
 16 Oakland, CA 94612
 17 Telephone: (510) 452-5500
 18 Facsimile: (510) 452-5510

19
 20 Attorneys for Plaintiffs Joseph Harrison, Krystle
 21 Harrison, Martin Harrison, Jr., and Tiffany Harrison

22
 23
UNITED STATES DISTRICT COURT
 24
FOR THE NORTHERN DISTRICT OF CALIFORNIA

25 M.H., a minor, through his Guardian Ad Litem,) Case No. C11-2868 CW (MEJ)
 26 Michelle Henshaw, JOSEPH HARRISON, KRYSTLE)
 27 HARRISON, MARTIN HARRISON, JR., and)
 28 TIFFANY HARRISON, all Individually and as Co-)
 Successors in Interest of Decedent MARTIN)
 HARRISON,)
 Plaintiffs,)
 vs.)
 COUNTY OF ALAMEDA, a municipal corporation;)
 SHERIFF GREGORY J. AHERN, in his individual and)
 official capacities; DEPUTIES MATTHEW AHLF,)
 ALEJANDRO VALVERDE, JOSHUA SWETNAM,)
 ROBERTO MARTINEZ, ZACHARY LITVINCHUK,)
 RYAN MADIGAN, MICHAEL BARENO,)
 FERNANDO ROJAS-CASTANEDA, SHAWN)
 SOBRERO, SOLOMON UNUBUN; MEGAN HAST,)
 A.S.W.; CORIZON HEALTH, INC., a Delaware)
 corporation; HAROLD ORR, M.D.; ZELDA)
 SANCHO, L.V.N.; and DOES 5-20, individually,)
 jointly and severally,)
 Defendants.)

**STIPULATION TO AND REQUEST
 FOR SETTING OF CASE
 MANAGEMENT CONFERENCE**

1 ALL PARTIES, THROUGH THEIR RESPECTIVE COUNSEL OF RECORD, HEREBY
 2 STIPULATE, AND REQUEST THIS COURT TO SET a case management conference for
 3 **February 6, 2013 at 2:00 p.m.**

4 This is a complex wrongful death /civil rights case that arose in the Alameda County Jail,
 5 with five Plaintiffs, and initially 12 named Defendants, and 20 Doe Defendants. The parties
 6 exchanged initial disclosures, exchanged written discovery, and subpoenaed records. Defendants
 7 took six depositions. Plaintiffs also took six depositions.

9 Plaintiffs subsequently moved the Court to grant leave to file a Second Amended Complaint
 10 in this matter, which included the substitution of Megan Hast, A.S.W., Corizon Health, Inc., Harold
 11 Orr, M.D., and Zelda Sancho, L.V.N. in place of previously named Doe Defendants. The Court
 12 granted Plaintiffs' Motion and ordered the parties to meet and confer to agree on a case
 13 management schedule.

15 The parties have met and conferred but have not been able to reach agreement regarding a
 16 case management schedule. As such, the parties request that the Court set a case management
 17 conference to discuss the case management schedule, including the scope of discovery after the
 18 addition of the new defendants and in light of discovery already completed in this matter to date.
 19 All parties that have appeared in this matter¹ stipulate and agree to February 6, 2013 at 2:00 p.m. as
 20 the date and time for a case management conference.

22 //

23 //

25 //

26 //

27

28

¹ Counsel for Defendants Harold Orr, Jr., M.D. and Corizon Health, Inc. has advised that at this time, they do not represent Defendant Zelda Sancho, L.V.N., who has not yet appeared in this action.

1 Therefore, the parties respectfully request that this Court set a case management conference
2 in this matter for February 6, 2013 at 2:00 p.m.

3 Dated: January 23, 2013

4 HADDAD & SHERWIN

5 /s/ Michael J. Haddad

6 MICHAEL J. HADDAD
7 Attorneys for Plaintiffs
8 JOSEPH HARRISON, KRYSTLE HARRISON,
9 MARTIN HARRISON JR., and TIFFANY
HARRISON

10 Dated: January 23, 2013

11 THE LAW OFFICES OF JOHN L. BURRIS

12 /s/ Benjamin Nisenbaum*

13 BENJAMIN NISENBAUM
14 Attorneys for Plaintiff
15 M.H.

16 Dated: January 23, 2013

17 ANDRADA & ASSOCIATES

18 /s/ J. Randall Andrada*

19 J. RANDALL ANDRADA
20 Attorneys for Defendants
21 COUNTY OF ALAMEDA, GREGORY G. AHERN,
22 MATTHEW ALHF, ALEJANDRO VALVERDE,
23 JOSHUA SWETNAM, ROBERTO MARTINEZ,
24 ZACHARY LITVINCHUK, RYAN MADIGAN,
MICHAEL BARENO, FERNANDO ROJAS-
CASTANEDA, SHAWN SOBRERO, SOLOMON
UNUBUN, and MEGAN HAST, A.S.W.

1 Dated: January 23, 2013

LAW OFFICES OF NANCY E HUDGINS

2 /s/ Matthew M. Grigg*

3 NANCY E. HUDGINS
4 MATTHEW M. GRIGG
5 Attorneys for Defendants
6 HAROLD ORR, JR., M.D. and CORIZON HEALTH,
INC.

7 * Mr. Nisenbaum, Mr. Andrada and Mr. Grigg provided their consent that this document be
8 electronically filed.
9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

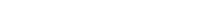
27

28

ORDER

Pursuant to stipulation of the parties and good cause appearing therefore, IT IS SO ORDERED except that the case management conference will be held on March 7, 2013, at 2:00 p.m.

Dated: 1/24/2013


HONORABLE CLAUDIA WILKEN
United States District Judge